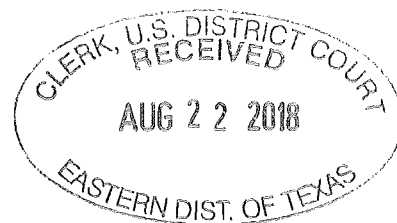


UNITED STATES DISTRICT COURTS  
EASTERN DISTRICT OF TEXAS  
DIVISION



Keven Chumley

Case Number: 6:18-CV-00336-RWS

Name of Plaintiff(s)

vs

Smith County sheriffs office

Name of Defendant(s)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

Note: If plaintiff is alleging employment discrimination based on race or color, please also see 42 U.S.C. 1981

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the court by 42 U.S.C. 2000e-5. Equitable and other relief are also sought under 42 U.S.C. 2000e-5(g).

- 2.. Plaintiff, Keven Chumley, is a citizen of the United States  
(name of plaintiff)

and resides at 102 Chumley St., Longview,  
(street address) (city)

Grebb, TX, 75602, 903-4458808  
(county) (state) (zip) (telephone)

3.. Defendant, Smith Co. Sheriff's office resides at, or its business is  
(name of defendant)

located at 227 N. Spring Ave, Tyler,  
(street address) (city)

Smith Co., TX, 75702, 903-5902669.  
(county) (state) (zip) (telephone)

4. Plaintiff sought employment from the defendant or was employed by the defendant

at 2811 Public Rd, Tyler,  
(street address) (city)

Smith Co, TX, 75702.  
(county) (state) (zip)

5. Defendant discriminated against plaintiff in the manner indicated in paragraphs 9 and 10  
of the complaint on or about 2016.  
(month, day, year)

6. Plaintiff filed charges against the defendant with the Equal Employment Opportunity  
Commission charging defendant with the acts of discrimination indicated in paragraphs  
9 and 10 of this complaint on or about \_\_\_\_\_.  
(month, day, year)

7. The Equal Employment Commission issued a Notice of Right to Sue which was  
received by plaintiff on March 7, 2018.  
(month day, year)

DOJ - write to sue

June 1,  
2018

8. Because of plaintiff's (1) ☒ race, (2) ☒ color, (3) ☒ sex,

(4) \_\_\_\_\_ national origin, defendant:

a. \_\_\_\_\_ failed to employ plaintiff.

b. \_\_\_\_\_ terminated plaintiff's employment.

c. ☒ failed to promote plaintiff.

d. \_\_\_\_\_ Other Religion & harassment  
Retaliation

9. The circumstances under which the defendant discriminated against plaintiff were as follows:

Violation of The Civil Rts act of  
1964 'Color' Religion

Federal Retaliation Act of 2002 & Hostile  
work environment.

1. Failed to promote due to race.

2. Critized muslims religion.

3. Hostile work environment from other ~~others~~  
officers, closed cell door and broke Rthand.

4. Retaliation by Supervisors failed to  
promote & failed to comply with Insurance  
standards, After selected insurance would  
not allow to use when needed.

10. The acts set forth in paragraph 9 of this complaint:

- a. \_\_\_\_\_ are still being committed by defendant.
- b. \_\_\_\_\_ are no longer being committed by defendant.
- c. ☒ defendant may still be committing the acts.

11. Plaintiff attaches to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission which charges are submitted as a brief statement of the facts supporting this complaint. WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- a. \_\_\_\_\_ Defendant be directed to employ plaintiff.
- b. \_\_\_\_\_ Defendant be directed to re-employ plaintiff.
- c. ☒ Defendant be directed to promote plaintiff.
- d. ☒ Defendant be directed to End Hostile <sup>work</sup> environment and that the

Court grant such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

Reven Chenley  
(Signature of Plaintiff)

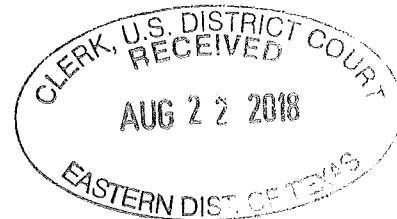
102 Chumley St. Longview, TX 75602 Tel: 903-757-4196 [kevenchumley@hotmail.com](mailto:kevenchumley@hotmail.com)

**Keven Chumley**

08/20/2018

TO: U.S. District Court  
106 Federal Building,  
211 W. Ferguson St.  
Tyler, Texas 75702

EEOC  
Attn: Angel Padilla  
207 South Houston St.  
3<sup>rd</sup> Floor  
Dallas, Texas 75202-4726



Civil Action NO. 6:18-CV-00336-RWS  
EEOC Inquiry # 450-2017-03850N

**RE: Order to Amend Complaint**

Dear Your Honor Magistrate Judge John Love:

In reference to your Honors Order to file an amend complaint and to move ahead pro-see. As an African American male. I am protected under The United States Anti Discrimination Civil Rights Act of 1964 and The Federal Retaliation Act Of 2002 as well as The Civil Rights Act. I am also covered under the Federal Act of free from Hostile Environment in the work place. For Instance, Sgt. McCambridge repeatedly asked me if I have been in bed with another man, Sgt. McCambridge repeatedly said that "Muslims should go back to Fucking Europe and he was tired of there Fucking Prayers" Sgt. McCambridge repeatedly put me in filthy work environments, because I complained, Sgt. McCambridge called me "Boy", Sgt. Currin a friend of Sgt. McCambridge became upset with me by raising his voice at me for going to the restroom, Officer Armadore called me a "Snitch" and he closed a cell door on my right hand, which broke the hand, I was denied an Sergeant promotion twice due to my race, Management hired Carcasions each time. Even with four degrees and a BA in Criminal Justice with 11 years of experience I was denied promotion, I elected Accident and Short-Term on my Insurance by Sgt. McCambridge. When my doctor took me off work for 15 weeks I was again retaliated against by Management and not allowed to use the coverage, and Sgt. Currin methodically repeatedly picked at me by making my work place a hostile environment.

In Brief, The Smith County Sheriff Office violated The United States Anti Discrimination Act & Civil Rights Act and The Federal Retaliation Act of 2002. Therefore, relief is justified.

Sincerely,

*Keven Chumley*  
Keven Chumley

**K Chumley**  
102 Chumley St  
Longview, TX 75602-1404

**CERTIFIED MAIL**

PLACE YOUR RETURN ADDRESS IN THE RETURN ADDRESS BOX

7017 1000 0000 8281 0449

United States District Court  
1000 0000 8281 0449  
Federal Building

106 Federal St.  
911 W. Ferguson

Tyler, TX 75702

2010-10-01



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75702

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